

EHS&L Document

AREVA Richland Site Dangerous Waste Contingency Plan

Nature of Changes

Item	Paragraph	Description	Justification
1.	Entire Document	Revised to reflect elimination of etch process	Etch process permanently discontinued.
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
List Below any Documents, including Forms & Operator Aids which must be issued concurrently with this document revision:			

This Document contains a total of 19 pages excluding the signature page generated by Documentum, the document control application software.

DOCUMENT REVIEW/APPROVAL/DELETION CHECKLIST

All new and/or revised procedures shall be approved by the change author, cognizant manager(s) of areas affected by the changes, and by applicable manager(s) of any function that approved the previous revision of the document unless responsibility for such approval has been transferred to another organization. Also, the procedure shall be approved by manager(s) of functional organizations that provide technical reviews with the exception of the Training Department. Finally, Document Control shall verify that the required approvals have been properly obtained and that any documents that must be issued concurrently are ready to be issued.

Minor Changes: If the proposed changes are limited to editorial and/or administrative changes check the box at the right. The document will be routed directly for review by EHS&L without technical review. All applicable approvals must still be obtained.			<input type="checkbox"/>	
Document Reviews			Document Approvals	
Purpose/Function of Review	Specify Reviewer(s) (Optional except for change author)	(Check all that apply)	Title of Approver	(Check all that Apply)
Document Control (Automatic)		<input checked="" type="checkbox"/>	Document Control (Automatic)	<input checked="" type="checkbox"/>
Change Author	LJ Maas	<input checked="" type="checkbox"/>	Author	<input checked="" type="checkbox"/>
Independent Technical Review	JM Deist	<input checked="" type="checkbox"/>		
Operability Review(s)			Mgr, Richland Operations ⁽¹⁾	<input type="checkbox"/>
Conversion		<input type="checkbox"/>	Mgr, Uranium Conversion & Recovery Operations ⁽¹⁾	<input type="checkbox"/>
Recovery		<input type="checkbox"/>	Mgr, Ceramic Operations ⁽¹⁾	<input type="checkbox"/>
Ceramics		<input type="checkbox"/>		
Rods		<input type="checkbox"/>	Mgr, Rods & Bundles ⁽¹⁾	<input type="checkbox"/>
Bundles		<input type="checkbox"/>		
Transportation		<input type="checkbox"/>	Mgr, Component Fabrication ⁽¹⁾	<input type="checkbox"/>
Components		<input type="checkbox"/>	Mgr, Maintenance ⁽¹⁾	<input type="checkbox"/>
Maintenance Review		<input type="checkbox"/>	Mgr, Analytical Services ⁽¹⁾	<input type="checkbox"/>
Lab Review		<input type="checkbox"/>	Mgr, EHS&L ⁽²⁾	<input type="checkbox"/>
EHS&L Review(s)			Mgr, Criticality Safety ⁽²⁾	<input type="checkbox"/>
Criticality		<input type="checkbox"/>		
Radiation Protection		<input type="checkbox"/>	Mgr, Safety, Security & Emergency Preparedness ⁽²⁾	<input type="checkbox"/>
Safety/Security	TJ Tate	<input checked="" type="checkbox"/>		
Emergency Preparedness	JM Deist	<input checked="" type="checkbox"/>		
MC&A		<input type="checkbox"/>	Mgr, Licensing & Compliance ⁽²⁾	<input checked="" type="checkbox"/>
Transportation		<input type="checkbox"/>		
Environmental	JB Perryman	<input checked="" type="checkbox"/>		
BWR Product Eng. Review		<input type="checkbox"/>	Mgr, BWR Product Engineering	<input type="checkbox"/>
BWR Core Engineering Review		<input type="checkbox"/>	Mgr, BWR Core Engineering	<input type="checkbox"/>
Codes and Methods Review		<input type="checkbox"/>	Mgr, Codes and Methods	<input type="checkbox"/>
Proj. Eng. & Design Support Review		<input type="checkbox"/>	Mgr, Proj. Eng. & Design Support	<input type="checkbox"/>
Quality Review		<input type="checkbox"/>	Mgr, Quality	<input type="checkbox"/>
Project & Plant Eng. Review		<input type="checkbox"/>	Mgr, Project & Plant Eng.	<input type="checkbox"/>
Purchasing Review		<input type="checkbox"/>	Mgr, Purchasing	<input type="checkbox"/>
Others:		<input type="checkbox"/>	Mgr, Richland Site/Other	<input type="checkbox"/>
Training & Employee Dev.: ⁽³⁾		<input type="checkbox"/>	Training & Employee Dev.	<input type="checkbox"/>

⁽¹⁾Note: If approvals include 2 or more product center managers, the Operations manager can be substituted for the applicable product center managers.

⁽²⁾Note: If approvals include 2 or more EHS&L functional managers, the EHS&L manager can be substituted for the applicable EHS&L functional managers.

⁽³⁾Note: Training department review is required for all procedures that require or affect a Learning Plan and if additional training materials or curriculum must be revised before issuing procedure.

EHS&L Change Impact Evaluation Form		
Document / ECN No*: E06-07-011		Change Evaluator: LJ Maas
Does the change potentially impact Criticality Alarm System (CAS) coverage?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
NRC Pre-Approval Evaluation:		
Is NRC Pre-approval (License Amendment) Needed? (Based on "Yes" answer to any of five questions below). (Based on "No" answer to all five questions below).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 (create high or intermediate consequence events) and that have not previously been described in AREVA NP Inc's ISA Summary?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
2. Does the change use new processes, technologies, or control systems for which AREVA NP Inc. has no prior experience?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
3. Does the change remove, without at least an equivalent replacement of the safety function, an item relied on for safety that is listed in the ISA Summary?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
5. Does the change qualify as a change specifically prohibited by NRC regulation, order, or license condition?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
Actions Required Prior to or Concurrent with Change Implementation Evaluation:		
Action		Explanation
6. Modification / Addition to CAS system or system coverage documentation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
7. Acquire NRC pre-approval (license amendment)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
8. Conduct/modify ISA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
9. ISA Database Modification	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
10. Modification of other safety program information / underlying analyses (PHA, RHA, FHA, NCSA, etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:
Actions required subsequent to Change Implementation Evaluation:		
11. Update safety program information (PHA,RHA,FHA,NCSA, P&ID)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, explain:

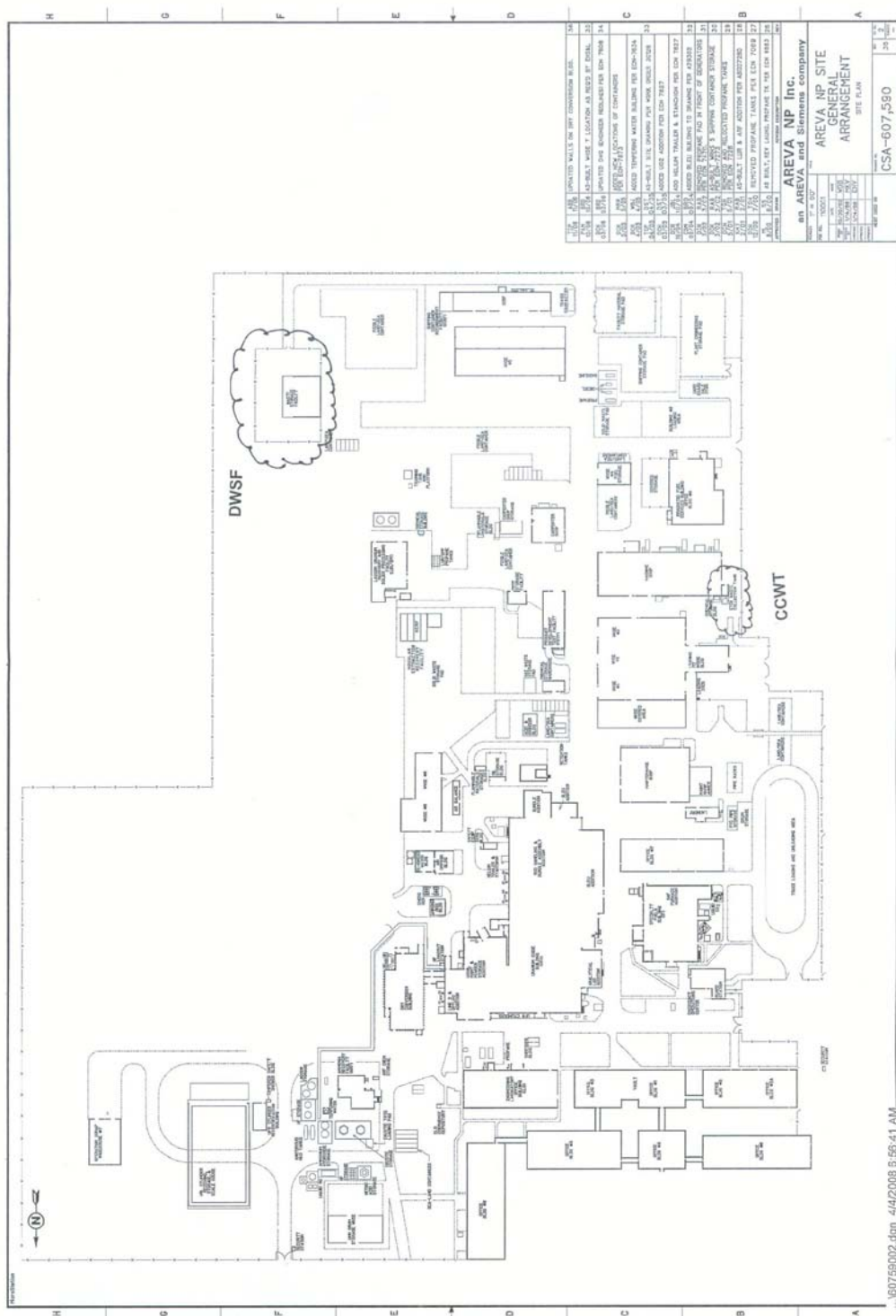
* **If this form exists as a part of a document, the document number is not required.**

1.0 **General Information**

1.1 ***Purpose/Scope***

This Dangerous Waste Contingency Plan applies to the AREVA NP Inc. nuclear fuel fabrication facility located at 2101 Horn Rapids Road, Richland, Washington. The plan has been formulated to meet the requirements of WAC 173-303-350 and considers applicable guidance in Section G of the Washington State Department of Ecology's (Ecology's) Dangerous Waste Permit Application Requirements (Publication No. 95-402; June 1996). The purpose of this plan is to lessen the potential impact on the public health and the environment in the event of any emergency circumstance, including a fire, explosion, or unplanned sudden or non-sudden release of dangerous waste or dangerous waste constituents to air, soil, surface water, or groundwater from either of the site's two permitted dangerous waste management units. Those units are the Dangerous Waste Storage Facility (DWSF) - a container storage unit located in the southeast corner of the AREVA site - and the Component Chemical Waste Tank (CCWT) - a 2000 gallon capacity tank-in-tank unit located outside the northwest corner of the AREVA Component Center on the western edge of the AREVA site. A site plan showing the locations of the DWSF and CCWT is provided as Figure 1.

Figure 1 DWSF and CCWT Locations



1.2 ***Facility Description***

The overall mission of the AREVA Richland facility is the manufacture of nuclear fuel products for use in commercial nuclear power reactors. Products typically produced at the plant include uranium dioxide powder, uranium dioxide pellets, and finished nuclear fuel assemblies composed of fuel rods loaded with uranium dioxide pellets. In support of that mission the site includes, within its approximately 55 acre fenced portion, a number of major processing facilities along with a variety of supporting facilities (storage warehouses, maintenance shops, waste treatment/storage facilities, office/administrative buildings, etc.). The layout of those facilities is shown in Figure 1.

1.2.1 Dangerous Waste Storage Facility (DWSF)

Site activities (production, maintenance, waste management, etc.) produce a number of solid wastes that designate as dangerous wastes under Ecology's dangerous waste regulations. In many cases these dangerous wastes also contain uranium and thus are classified as mixed wastes (chemically and radiologically regulated). The DWSF provides an isolated engineered facility at which these containerized wastes, typically drums but in some cases waste boxes, can be stored on an interim basis prior to final disposition offsite. For a limited number of containers the DWSF provides long-term storage while final disposal options are sought.

The DWSF consists of an approximately 170' x 120', minimum 2-inch thick asphalt pad on which an approximately 70' x 75' roofed, three-sided building has been placed. The covered area of the facility is partially bermed and appropriately sloped to prevent storm water run-on. All containers stored at the DWSF are elevated on pallets or skids to prevent contact with storm water. All drums with free liquids present, albeit limited in number, are stored on secondary containment pallets. Containers stored at the DWSF are strong-tight containers appropriate for the type of waste stored. The facility and containers are inspected on a weekly basis at a minimum and routinely surveyed under AREVA's radiation protection program. A photograph of the DWSF, and in particular the covered portion, is provided as Figure 2.

Figure 2 Dangerous Waste Storage Facility



1.2.2 Component Chemical Waste Tank (CCWT)

The CCWT provides interim storage of liquid chemical wastes from a dip tank-based process (component pickling) applied to small metallic components used in the manufacture of fuel rods and fuel assemblies. The wastes designate as D002 Corrosive under Ecology's Dangerous Waste Regulations and are ultimately dispositioned via tanker truck to an offsite waste treatment/disposal contractor.

The CCWT is a tank-in-tank system - a 2000 gallon inner tank and a 3500 gallon external containment tank. Both tanks are made of high density cross-linked polyethylene for full compatibility with the waste solutions. The tanks are situated on a 6-inch thick reinforced concrete monolithic slab with thickened perimeter edges. Pipes and fittings associated with the tanks are stainless steel or polyethylene and located above ground. The inner tank is managed to less than 85 percent capacity via electronic level indication with alarm capability. A leak detection system with alarm capability is installed to detect any release of liquids from the inner tank into the outer containment tank. A photograph of the CCWT is provided as Figure 3.

Figure 3 Component Chemical Waste Tank



2.0 Emergency Coordinators

Coordination and direction of on-the-scene emergency response measures at the AREVA site are the responsibility of the Incident Commander (IC). The IC position is staffed on a rotating basis from a designated cadre of senior plant staff; coverage by an assigned IC is provided 24 hours per day, 7 days a week. In responding to an emergency, the IC is the commander of the Plant Emergency Response Team (PERT). The PERT is a specially trained group of professional and technical company employees that includes key operational and maintenance personnel, health and safety technicians, and at least one representative from each major operating facility containing radioactive or hazardous materials.

AREVA ICs are senior members of the PERT and as such receive the full complement of emergency response and health and safety training provided yearly to the PERT. In addition the ICs shall be thoroughly familiar with facility operations and activities, the location and properties of hazardous materials and wastes handled onsite, the location of key records and information pertinent to emergency response, the overall layout of the facility, and all aspects of this contingency plan.

Contact information (names, addresses, office and home phone numbers) for the IC On-Duty, as well as for all backup ICs, can be attained on a 24-hour, 7 day per week basis by calling the AREVA 24-hour response number at 509-375-8259.

Authority for the IC to conduct his assigned duties and to commit the necessary resources to implement this contingency plan are granted by the Richland Site Manager, who serves as the site's overall Plant Emergency Director. Duties of the IC are as follows:

- on-the-scene management of PERT personnel;
- search and rescue;
- first aid to emergency victims, with possible transfer to an ambulance for transport offsite;
- re-entry and recovery operations;

- incipient stage fire fighting;
- incipient stage chemical spill control;
- requesting offsite assistance for emergency situations deemed beyond the capabilities/resources of the PERT;
- establishment of a unified command post for those situations in which the Richland Fire Department has been called in; and
- upon termination of the emergency, securing of the area, completion of After Action Reports, and supervision of cleaning and restoration of emergency equipment and supplies.

As noted above, there may be emergency situations beyond the capabilities and resources of the PERT for which the Richland Fire Department is called in. The Fire Department has jurisdictional authority to assume incident command responsibilities, including decisions to call in additional hazmat response capabilities such as the Tri County Hazardous Materials Response Team. In these situations, the AREVA IC will work in a supportive or co-command role via a unified command center. Additional information on AREVA's coordination agreements for offsite assistance is provided in Section 6.0 below.

3.0 **Circumstances Prompting Implementation**

3.1 ***General Criteria***

Although AREVA will respond as appropriate to all releases of dangerous wastes or dangerous waste constituents, formal implementation of this contingency plan is reserved for dangerous waste-driven emergencies. For the purpose of this plan, **emergency** refers to a fire, explosion, or sudden or non-sudden release of dangerous waste or dangerous waste constituents to the environment, i.e. the air, soil, surface water, or groundwater, that constitutes a threat to the public health or the environment. **Threat** in turn depends on (1) the characteristics of the material, (2) the amount spilled, (3) whether immediate containment occurs, and (4) the environmental media involved. Characteristics of a threat could include any of the following:

- an individual, as a result of exposure, seeking or requiring medical services;

- potential for the material to enter water, including surface water, groundwater, storm drains, or ditches;
- releases to the air in concentrations or quantities sufficient to harm people, animals, or plants; or
- a spill to soil that cannot be quickly controlled, contained, or cleaned up.

Incidental releases of dangerous wastes or dangerous waste constituents that can be absorbed, neutralized, or otherwise controlled by AREVA personnel such that an actual or reasonably anticipated threat to the public health or the environment is not present are not considered to be emergencies. Responses to such events will not be considered as implementation of this contingency plan.

3.2 ***Implementation for the DWSF***

The probability for an emergency as defined in 3.1, above, to occur at the DWSF is very low. This is due to a number of factors including the small volumes of the containers (typically 55 gallons), the nature of the contained wastes (typically solids; some liquids in drum quantities on containment pallets), the non-combustibility of the DWSF structure, the effectiveness of frequent inspections in detecting non-sudden releases, and the lack of any significant number of plausible scenarios to release the contents of multiple containers on a catastrophic basis. Nonetheless, as a conservative assumption, this contingency plan will address the possibility for the simultaneous release of wastes from a number of containers via a fire or physical accident, allowing for the potential release of dangerous wastes or dangerous waste constituents to the air or, via runoff, to the surrounding soil. Emergency procedures for the response to such scenarios are discussed in Section 4.0, below.

3.3 ***Implementation for the CCWT***

This contingency plan addresses the catastrophic release of the contents of the CCWT and runoff of the liquids across the surrounding asphalt to adjacent soil. Release of liquids to the soil via cracks in the asphalt would constitute a smaller secondary pathway to the environment. The probability for such an occurrence is very low due to the materials of construction of the CCWT, its tank-in-tank design, its placement on a raised slab protected by bollards, and the relative lack of combustible materials around the tank or within adjacent portions of the Component Center. Such a release is nonetheless conservatively postulated via a physical

accident (e.g., vehicle impact) or facility fire. Emergency procedures for the response to a catastrophic liquid release are discussed in Section 4.0, below.

4.0 Emergency Response Procedures

4.1 *Emergency Response at the DWSF*

Dangerous waste-driven emergencies at the DWSF will be responded to by the AREVA PERT under the leadership of the on-duty AREVA IC. Emergencies triggering the implementation of this contingency plan will involve releases of dangerous wastes or dangerous waste constituents to the environment (air, soil, surface water, or groundwater) that involve an actual or reasonably anticipated threat to the environment or public health. Incidental releases as defined in 3.1, above, will typically be responded to by plant operating personnel under the direction of line management and safety personnel; such responses, even if involving PERT, do not constitute emergencies or implementation of this contingency plan.

AREVA maintains a PERT response procedure directing emergency response at the DWSF. The procedure addresses:

- Onsite notifications via the fire alarm system or the 8111 plant emergency number;
- Requests for offsite assistance;
- Evacuation protocol;
- Incipient firefighting;
- Hazardous materials identification;
- Spill curtailment/containment; and
- Follow-up actions

4.2 *Emergency Response at the CCWT*

Dangerous waste-driven emergencies at the CCWT will be responded to by the AREVA PERT under the leadership of the on-duty AREVA IC. Emergencies triggering the implementation of this contingency plan relative to the CCWT will involve only those releases of waste liquids that pose an actual or reasonably anticipated threat to the environment (air, soil, surface, water, or

groundwater) or the health of the public. Incidental releases (see 3.1, above) will typically be responded to by plant operating personnel under the direction of line management and safety personnel; such responses, even if involving PERT, do not constitute emergencies or implementation of this contingency plan.

AREVA maintains a PERT response procedure directing emergency response at the CCWT. The procedure addresses the same elements as addressed by the PERT response procedure for the DWSF, as listed in 4.1, above.

5.0 Emergency Equipment

AREVA maintains emergency response equipment throughout the site, near potential sites of use and at strategically located repositories. Emergency equipment pertinent to the DWSF and CCWT is listed in Table 1, attached.

6.0 Coordination Agreements

AREVA maintains coordination agreements with key outside agencies that may be called upon to provide assistance in the event of an emergency. These agreements are formalized in memoranda of understanding maintained on-file at AREVA and the participating agency. The agencies and their supporting roles are listed below. It should be noted that these agencies have been enlisted to provide support for the full range of emergencies postulated for AREVA's nuclear fuel fabrication site. Support for emergencies related to the DWSF or CCWT would primarily involve the Richland Fire Department with its firefighting and its extended hazardous material response capabilities.

Agency	Services
Richland Fire Department	Firefighting; hazardous materials response
Richland Police Department	Law enforcement; tactical response; explosives detection
Benton County Emergency Services	Emergency communications; emergency response mutual aid
Franklin County Emergency Management	Emergency communications
Kadlec Medical Center	Medical treatment
U.S. Department of Energy	Alternate emergency operations center; emergency communications
Energy Northwest	Alternate emergency operations center; emergency equipment; emergency field personnel; Joint Information Center

AREVA is a restricted access facility and therefore all offsite personnel responding to the site will be met by, and work in close coordination with, AREVA plant personnel. Responders providing on-the-scene field support will work in conjunction with the AREVA PERT under the direction of the AREVA IC, or possibly under the direction of a unified AREVA/Richland Fire Department command center.

Advance preparation for potential offsite responders is provided via an annual familiarization meeting/tour. Invited parties include pertinent regulatory agencies, key emergency response organizations, and Richland facility neighbors. In addition, the Richland Fire Department and Benton and Franklin County EOCs have been provided with copies of the site's overall Emergency Plan and Pre-Emergency Plan. The Pre-Emergency Plan provides facility maps and for each facility, including the DWSF and the Component Center, a physical facility description, typical occupancy levels, a summary of radioactive/hazardous material inventories, and a listing of fire protection equipment.

First-line medical response at AREVA is provided by the plant's health and safety technicians (HSTs) who, as members of PERT, receive annual advanced first aid training. Members of PERT as well as the AREVA IC will interface with responding medical personnel relative to known or potential radioactive or chemical exposures to accident victims. This includes emergency responders involved in transporting victims to the hospital. If the victim is radiologically contaminated, an HST will accompany the accident victim to the hospital.

7.0 Evacuation Plan

Both the DWSF and the CCWT are outdoor facilities, although the DWSF does include a large 70' x 75' roofed, three-sided enclosure. The CCWT does not constitute an occupied workstation; the DWSF is typically unoccupied but may have personnel present during waste container additions/removals, waste shipment preparatory activities, and inspections.

Due to the nature and limited quantities of the dangerous waste and dangerous waste constituents managed at the DWSF and CCWT, the need for personnel evacuations would be unlikely and limited to onsite personnel, even for circumstances triggering the implementation of this contingency plan.

For fire-related releases, the evacuation signal is a fire alarm. For the DWSF, the fire alarm can be activated by a manual pull-station located in the southeast corner of the covered structure or by heat detectors at ceiling level at numerous locations within that structure. The alarm also is relayed to the continuously monitored Central Guard Station, indicating the existence and location of the alarm. For the CCWT, manual fire alarm pull-boxes and overhead heat detectors are located throughout the adjacent Component Center, including a pull-box just inside the door of the immediately adjacent **pickling room**. As in the case of the DWSF, Component Center fire alarms are electronically relayed to the Central Guard Station.

For fires, standard practice is to evacuate to a location well clear of the affected facility, upwind, and out of the way of emergency responders. Personnel are trained to this protocol via annual site safety training and periodic fire drills.

Non-fire-driven emergencies requiring implementation of this contingency plan would be reported via dialing the Central Guard Station at 8111. Protective measures, including any evacuation instructions, would be conveyed via the plant public address system, audible throughout the plant site at indoor and outdoor locations. Plant phone sets are located throughout the Component Center, including within the **pickling room**. A single phone is located in the DWSF, adjacent to the fire alarm pull-station. Local facility evacuation instructions would typically match those related to a fire, i.e., clear of the facility, upwind, and out of the way of emergency responders.

Although not foreseen to be needed for the DWSF or CCWT, the site has an established total site evacuation protocol, which includes designated staging areas in the west parking lot.

Evacuation instructions would be conveyed via the public address system. Full site evacuations are conducted on a periodic basis in conjunction with criticality alarm drills.

8.0 Follow-up Actions (Reports, Recordkeeping, Certifications)

8.1 *Recording Contingency Plan Implementation*

Incidents requiring implementation of this contingency plan relative to the DWSF or CCWT must be recorded in the plant operating record, including documentation of time, date, and other pertinent details of the incident. This may be accomplished via the completion/filing of a spill report in accordance with plant procedures.

8.2 *Reporting Contingency Plan Implementation*

Within fifteen (15) days of an emergency requiring implementation of this contingency plan relative to the DWSF or CCWT, a written report must be filed with the Department of Ecology. The report must include the information called for in WAC 173-303-360(2)(k). For the CCWT, the report must also contain the information in 173-303-640 (7)(d)(ii) - see 8.3, below.

8.3 *Notification Prior to Restart*

Prior to restart of the DWSF or CCWT after an emergency requiring implementation of this contingency plan, Ecology and appropriate local authorities must be notified that the requirements in 173-303-360(i) have been complied with, namely that wastes potentially incompatible with the released materials are not managed until cleanup procedures are completed and affected emergency equipment is cleaned and fit for its intended use.

8.4 *Follow-up Actions for Releases from/Repairs to the CCWT*

WAC 173-303-640(7) imposes certain follow-up actions relative to leaks or spills from, or repairs to, the CCWT by virtue of its being a tank system.

8.4.1 CCWT Releases to the Environment

Per WAC 173-303-640(7)(d)(i), releases to the environment from the CCWT must be reported immediately to Ecology in accordance with 173-303-145 and, if exceeding a CERCLA reportable quantity, to the National Response Center in accordance with 40 CFR Part 302. Provisions for this reporting are included in the site's procedure for regulatory reporting of hazardous substance releases.

Releases to the environment from the CCWT reported to Ecology under 173-303-145 must be reported to Ecology via a 30-day follow-up report containing the information called for in 173-303-640(7)(d)(ii). If the release constituted an emergency requiring the implementation of this contingency plan, this report must be made within 15 days of discovering the release.

8.4.2 Certification of Major Repairs to the CCWT

If the CCWT has been repaired in accordance with 173-303-640(7)(e) because it has leaked or become otherwise unfit for use and those repairs have been extensive [per 173-303-640(7)(f)], the system must not be returned to service until its integrity has been certified by an independent, qualified, registered, professional engineer. This certification must be submitted to Ecology within seven days after returning the CCWT to use.

Table 1 Emergency Equipment for the DWSF and CCWT

Item	Application	Location
Telephone(s)	Emergency communication to Central Guard Station	SE corner of DWSF; throughout Component Center
Fire alarm pull stations	Fire alarm activation	SE corner of DWSF; throughout Component Center, including just inside door to Pickling room
Ceiling-mounted heat detectors	Fire alarm activation	Throughout DWSF structure and Component Center
Public address system speakers	Receipt of emergency instructions	Indoor/outdoor locations throughout site
Fire extinguishers	Incipient firefighting	NE and SE corner of DWSF; throughout Component Center; including Pickling room
Safety shower	Emergency decontamination	Adjacent to CCWT
Plastic drums/chemical totes	Emergency receipt of CCWT liquids	Historic waste storage pad/north tank farm
Drum overpacks and spare drums	Repackaging/overpacking of leaking/damaged drums at DWSF	Historic waste storage pad
Absorbent pigs/bulk absorbent media	Spill containment and absorption	DWSF Chemical Cleanup Kit (NE corner of DWSF); Essential Materials Warehouse; Emergency Equipment Repositories
Liquid transfer pumps	Liquid removal from CCWT or DWSF drums	DWSF Chemical Cleanup Kit (NE corner of DWSF); Maintenance Spare Parts facility
Personal protective equipment (goggles, boots, shoe covers, face shields, coveralls)	Personal protection during spill response/cleanup	DWSF Chemical Cleanup Kit (NE corner of DWSF); HST offices; Essential Materials Warehouse
Drum tourniquet	Emergency drum repair	DWSF Chemical Cleanup Kit
Acid spill kits	Acid spill response	At CCWT and inside Pickling room
Spill-X Acid Spill Extinguisher Unit	Acid spill neutralization and containment	At CCWT; Emergency Equipment Repositories
Respiratory protection equipment	Personnel protection during emergency response	HST offices; Emergency Equipment Repositories
Chemical foam trailer	Foaming surfaces of spill pools	UNH Storage Warehouse
Radiological survey equipment	Radiological characterization of spills/releases	HST offices
Chemical survey equipment (meters, detector tubes)	Chemical characterization of spills/releases	Industrial Hygiene office, HST offices, EOC repository

AREVA NP Inc.

E06 Environmental Protection
E06-07 Ecology - Required Plans

E06-07-011
Version 2.0

AREVA Richland Site Dangerous Waste Contingency Plan

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